

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE:)	CASE NO. 17-10025
)	
DOMINICA D. DEARING)	CHAPTER 13 PROCEEDING
)	
Debtor(s))	JUDGE JESSICA E. PRICE SMITH
)	
)	<u>MOTION TO APPOINT NEXT OF FRIEND</u>
)	<u>TO TESTIFY AT MEETING OF CREDITORS</u>
)	<u>ON BEHALF OF THE DEBTOR</u>
)	

Now comes Dominica D. Dearing, through Elizabeth Brown/Next of Friend (Mother), and hereby moves this Honorable Court for an Order permitting Elizabeth Brown to testify at the Meeting of Creditors on her behalf.

The Debtor is currently at the county jail and unable to appear at the Meeting of Creditors. Although counsel visited the Debtor at the county jail, he was unable to meet directly with her, only through a thick piece of Plexiglas. The Debtor was able to sign the documents as the documents were slid under the glass for her signature. However, she cannot appear at the Meeting of Creditors and also signed a Power of Attorney specifically appointing her mother as her spokesperson to testify on her behalf.

Rule 1004.1 of the Bankruptcy Rules of Procedure permits the appointment of a Next of Friend for the purpose of signing documents and testifying at the Meeting of Creditors. Since the Debtor is unable to attend and her mother is familiar with her financial affairs, the Debtor respectfully requests that this Court permit her mother to testify pursuant to the Power of Attorney, attached hereto marked Exhibit "A".

WHEREFORE, the Debtors pray that this Court enter an Order permitting Elizabeth Brown/Next of Friend (Mother) to testify at the Meeting of Creditors on her behalf.

Respectfully submitted,
/s/Lee R. Kravitz 0025634
Lee R. Kravitz (Reg. #0025634)
Attorney for Debtor(s)
4508 State Road
Cleveland, OH 44109
216-749-0808
Fax No. 216-749-5389
Email: leekravitz@sbcglobal.net

CERTIFICATE OF SERVICE

I certify that on April 27, 2017, a true and correct copy of the Motion was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Craig Shopneck, Esq.
Office of Chapter 13 Trustee
200 Public Square, Ste. 3860
Cleveland, OH 44114
(via ECF)

And by regular U.S. mail, upon all creditors, matrix attached hereto.

/s/Lee R. Kravitz 0025634
Lee R. Kravitz
Attorney for Debtor(s)